

EXHIBIT 12

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TEXAS LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, NATIONAL LEAGUE
OF UNITED LATIN AMERICAN CITIZENS,
LEAGUE OF WOMEN VOTERS OF TEXAS,
RALPH EDELBACH, and BARBARA MASON;

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, RUTH HUGHES, in her official
capacity as Texas Secretary of State, DANA
DEBEAUVOIR, in her official capacity as Travis
County Clerk, CHRIS HOLLINS, in his official
capacity as Harris County Clerk; JOHN W.
OLDHAM, in his official capacity as Fort Bend
County Elections Administrator; LISA RENEE
WISE, in her official capacity as El Paso County
Elections Administrator;

Defendants.

Civil Action
Case No. 20-cv-01006-RP

DECLARATION OF JOYCE GOLUB
(Pursuant to 28 U.S.C. § 1746)

I, Joyce Golub, am over the age of 18 and fully competent to make the following declaration. The facts in this declaration are based on my personal knowledge. If called upon as a witness, I would testify to these facts. Under penalty of perjury, I declare and state the following:

1. I am 73-years-old and have been a resident of Houston, Texas since 1976. I have resided at my current address since 2001. I have been an active voter my entire adult life, and am committed to voting in this election. I am also an active member of the League of Women Voters of Texas. I received my mail ballot on Friday, October 2, 2020.
2. I have been diagnosed and living with multiple sclerosis for 36 years of my life. I live alone, as my children are now grown and live elsewhere.

3. I am aware of Governor Greg Abbott's October 1, 2020 order. This order states that there will be only one place in all of Harris County, which has a population of approximately 4.6 million people and a land area of approximately 1,777 miles, where voters who qualify to vote by mail can drop-off their completed ballots.

4. Prior to his October 1 proclamation, Governor Abbott allowed counties to have multiple ballot drop-off locations in light of COVID-19, and Harris County had 12 in total. This restriction has unduly burdened me because of the increased distance I will now have to travel to submit my completed mail-in ballot in person. Further, the uncertainty this last-minute change to the elections process presents puts my ability to have my vote counted into jeopardy.

5. I am aware that the United States Postal Service sent a letter to Texas (and other states) stating that USPS cannot and will not guarantee the delivery of completed mail-in-ballots to county elections officials by the ballot receipt deadline because the interval is too short to accommodate USPS' delivery windows.

6. I am also aware that Governor Abbott has refused to respond to the Harris County Clerk's request to extend the deadline for counting all mail-in-ballots to November 9, 2020, which is currently the last day to count military ballots.

7. In light of these issues, I have zero faith that my mail-in-ballot will be delivered to the office of the Harris County Clerk if I send it through the United States Postal Service's mail system.

8. I have personally experienced delayed mail delivery at my home and mail that simply never arrived since Postmaster General Louis DeJoy began implementing widespread changes at USPS. My vote is much too precious for me to risk my mail-in ballot arriving to the county clerk's office late or not arriving at all. Therefore, I will not mail my ballot under any

circumstances.

9. Similarly, I will not risk voting in person. I am elderly, I have several underlying medical conditions, and I am being treated with an immune-modifying medication for multiple sclerosis. Governor Abbott will not mandate that all voters wear masks at the polls. Therefore, despite all the personal protective equipment (PPE) that the Harris County Clerk is making available at every location, voters cannot be forced to use it. I do not think it is reasonable to expect me to literally risk my life in order to exercise my constitutional right and responsibility to vote.

10. I am entitled to a mail-in-ballot, and I want to use my mail-in-ballot. I do not want to put my mail-in ballot into the hands of the USPS in light of the recent delays in mail service. I want to deliver my mail-ballot myself, so that I am 100% certain it has been received by the Harris County Clerk.

11. Because of Governor Abbott's October 1 order, I will now be forced to go to the only in-person drop-off location in all of Harris County – NRG Arena. Traveling that distance from my home could take as much as an hour or longer each way depending on the traffic conditions. I will not park and go inside the facility for the safety reasons I have already given. Once I get to the Arena, I and every other voter who cannot go into the facility, will have to line-up in a car queue to get to the point of contact with the staffers who will check my ID and compare the signature on the envelope with the signature I provide at that time.

12. This process will have to be repeated for as many as hundreds of thousands of voters in Harris County. It is very possible that the time and effort this process will take may exceed my limitation on stamina, and that afterwards, I will be far too exhausted to drive home.

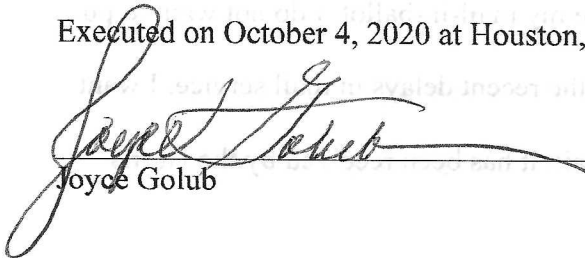
13. If Governor Abbott had not issued his October 1 order, I would have been able to drop-off my ballot at another Harris County Clerk Annex location which is nearly half the distance to

my home and is easily accessible on surface streets, allowing me to drive there without having to deal with congested freeways.

14. Governor Abbott's reduction in ballot drop-off locations is an unnecessary, unreasonable, and undue burden on my ability to return my mail-in ballot.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on October 4, 2020 at Houston, Texas.


Joyce Golub